



Myers & Galiardo, LLP | 52 Duane Street, 7Fl., New York, NY 10007 | 212-986-5900 | www.citylaw.nyc

December 28, 2022

EX PARTE

Hon. Nelson Stephen Roman
 United States District Judge
 Southern District of New York
 300 Quarropas Street
 White Plains, NY 10601

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #: _____
 DATE FILED: 1/4/2023

Re: United States v. James Bazemore, 22-cr-234 (NSR)

Dear Judge Roman:

I write, respectfully, pursuant to the Criminal Justice Act, to request the appointment of associate counsel to assist in the above referenced case. Specifically, I am requesting the appointment of Diane Ferrone, Esq. at an hourly rate of \$110, with approval of 100 hours. Ms. Ferrone has been appointed associate counsel on numerous CJA cases in the Southern District of New York. A copy of Ms. Ferrone's resume is attached.

Mr. Bazemore is charged with one count of racketeering conspiracy, one count of murder in aid of racketeering, and one count of use of a firearm resulting in death. If convicted, Mr. Bazemore is looking at a significant sentence.

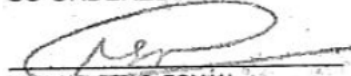
If appointed, Ms. Ferrone would assist with, among other things, reviewing the discovery, meeting with Mr. Bazemore, researching legal issues, investigating the relevant factual background and defenses, drafting motions, and preparing for Mr. Bazemore's defense at trial.

I am highly conscious of the importance of preventing the needless expenditure of CJA funds. Consistent with the goals of conserving resources, I believe the appointment of Ms. Ferrone in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher bill rate.

The Court grants Def. Bazemore's application seeking the appointment of Diane Ferrone, Esq., as associate counsel at a rate of \$110 per hour authorized for up to 100 hours without prejudice to seeking additional time. The Clerk of the Court is kindly directed to terminate the motion at ECF No. 36.

Dated: January 4, 2023
 White Plains, NY

SO ORDERED:


 HON. NELSON S. ROMAN
 UNITED STATES DISTRICT JUDGE

N ♦ Y ♦ C

MEMO ENDORSED

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

Matthew D. Myers

DIANE FERRONE

1740 Broadway, 15th Fl.
New York, NY 10019

(646) 337-9010
diane@dianeferronelaw.com

EXPERIENCE

The Law Offices of Diane Ferrone, PLLC

Oct. 13 - Present

www.dianeferronelaw.com

Represent individuals in various federal and state criminal and white collar matters.

Sercarz & Riopelle, LLP, New York, NY

July 09 - Sept. 13

Associate at boutique criminal defense law firm. Represented individuals in all aspects of state and federal criminal matters, including government investigations and prosecutions by the DOJ, district attorneys' offices and the SEC. Responsibilities included document review in complex fraud cases, motion practice and trial preparation. Handled proffer sessions, plea proceedings, bail revocation hearings and sentencing proceedings. Also represented individuals and entities in complex civil matters with significant motion practice and discovery, as well as depositions and court appearances.

Goldman, Sachs & Co., New York, NY

Jan. 08 - Jan. 09

Associate, Compliance Testing Group

Recruited to develop and conduct testing of effectiveness of business, supervisory, and compliance functions of Private Wealth Management division. Led team in conducting regulatory mandated branch office examinations. Drafted work papers detailing testing process (e.g., interviews, trading analysis), including findings and action items. Communicated findings to senior management.

Axiom Legal, New York, NY

Jan. 06 - Dec. 07

Provided on-site in-house counsel services to financial institutions:

The Bank of New York Mellon, Goldman Sachs and Morgan Stanley.

Responsibilities included management of mortgage-backed securities litigations and consultant to Civil Litigation Department; manager coverage in Private Wealth Management Compliance Division, reviewing and approving marketing presentations as well as drafting policies and procedures for asset allocation analysis; and consultant to the Investment Banking Division's Real Estate Investing Group (Law Department), drafting compliance policies and procedures under the federal securities laws and Investment Advisers Act of 1940, and creation and implementation of audit procedures with the Chief Compliance Officer.

Morvillo, Abramowitz, Grand, Iason & Silberberg, P.C., New York, NY

Feb. 04 - Sept. 05

Represented individual and institutional clients in all phases of white collar and civil matters, including administrative and governmental investigations. Responsibilities included counseling clients, responding to subpoenas, witness preparation, researching and drafting legal briefs and memoranda, document review and production, facilitating case management and attending regulatory agency and court proceedings. Pro bono representation of two criminal defendants.

Weil, Gotshal & Manges, LLP, New York, NY

Sept. 02 - Feb. 04

Associate in the Business & Securities Litigation Department; Summer Associate

Researched and drafted memoranda, briefs, motions and discovery responses. Conducted document review and production and prepared witnesses for depositions. Substantive areas of litigation included contractual disputes and business torts, with an emphasis on federal and state securities fraud actions. Pro bono representation of widow of 9/11 NYC firefighter.

United States District Court for the Eastern District of Pennsylvania

Aug. 01 - Aug. 02

Philadelphia, PA

Law Clerk to the late Honorable Jay C. Waldman

Reviewed court submissions, researched and drafted opinions, memoranda and orders in civil and criminal matters. Attended and prepared Judge for hearings, trials and sentencings.

EDUCATION

University of Pennsylvania Law School

J.D., May, 2001

Honors: Journal of International Economic Law - Senior Editor

Institute for Law and Philosophy - Executive Committee Member

Teaching Assistant to Law Professor's undergraduate Law & Philosophy class

Activities: Morris Fellow - mentor to incoming 1L; 1999 Orientation Leader

Council of Student Representatives - Social Chair, 1999-2001

Binghamton University

B.A. in Philosophy, Politics & Law, Spanish Minor, May, 1998

Honors: magna cum laude

Phi Beta Kappa

Dean's List all eight semesters

Golden Key National Honor Society

Recipient of Philosophy, Politics and Law in Britain Scholarship, Fall '97

Phi Sigma Iota - International Foreign Language Honor Society

Teaching Assistant: Philosophy of Law; Women in Politics; Environmental Ethics

University of East Anglia, Norwich, England, Fall 1997

Semester abroad studying Philosophy, Politics & Law with Binghamton Professor

LANGUAGE

Proficient in Spanish

BAR ADMISSIONS

New York State Bar; U.S. District Court for the Southern and Eastern Districts of New York

New York City Bar (member of the Criminal Advocacy Committee); New York Women's Bar Association